

# EXHIBIT N

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - # 84065  
2 rvannest@kvn.com  
CHRISTA M. ANDERSON - # 184325  
3 canderson@kvn.com  
DANIEL PURCELL - # 191424  
4 dpurcell@kvn.com  
633 Battery Street  
5 San Francisco, CA 94111-1809  
Telephone: (415) 391-5400  
6 Facsimile: (415) 397-7188

7 KING & SPALDING LLP  
BRUCE W. BABER (pro hac vice)  
8 bbaber@kslaw.com  
1185 Avenue of the Americas  
9 New York, NY 10036  
Tel: (212) 556-2100  
10 Fax: (212) 556-2222

11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,  
16 Plaintiffs,  
17 v.  
18 GOOGLE INC.,  
19 Defendant.

Case No. CV 10-03561 WHA

**DEFENDANT GOOGLE INC.'S FIRST  
SUPPLEMENTAL RESPONSES AND  
OBJECTIONS TO PLAINTIFF ORACLE  
AMERICA, INC.'S REQUESTS FOR  
ADMISSION**

**SET TWO (NOS. 245-277)**

1 unreasonably cumulative or duplicative to the extent that it seeks information that is more  
2 conveniently or less expensively obtained from another source or that is publicly available.  
3 Google objects to this Request for Admission to the extent it purports to include software created,  
4 modified, and/or distributed by third parties and not Google. Google further objects to this  
5 Request for Admission to the extent that it seeks information not within Google's possession,  
6 custody or control. As described further in General Objection Number 15, Google further objects  
7 to this Request for Admission as premature to the extent it seeks expert testimony.

8 Subject to and without waiving the foregoing objections and the General Objections, and  
9 to the extent that this request is understood, Google denies this request.

10  
11 **REQUEST FOR ADMISSION NO. 254:**

12 Admit Chrome OS contains DECLARING CODE contained in the 37 JAVA API  
13 PACKAGES.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 254:**

15 In addition to its General Objections, Google objects to this Request for Admission as  
16 vague, ambiguous and overly broad as to the phrases "Chrome OS," "contains," "declaring code  
17 contained in the 37 Java API Packages." Google objects to this Request for Admission as overly  
18 broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible  
19 evidence to the extent it seeks information not related to any party's claims or defenses or any  
20 relevant subject matter at issue. Google also objects to this Request for Admission as  
21 unreasonably cumulative or duplicative to the extent that it seeks information that is more  
22 conveniently or less expensively obtained from another source or that is publicly available.  
23 Google objects to this Request for Admission to the extent it purports to include software created,  
24 modified, and/or distributed by third parties and not Google. Google further objects to this  
25 Request for Admission to the extent that it seeks information not within Google's possession,  
26 custody or control. As described further in General Objection Number 15, Google further objects  
27 to this Request for Admission as premature to the extent it seeks expert testimony.

28 Subject to and without waiving the foregoing objections and the General Objections, and

1 to the extent that this request is understood, Google denies this request.

2  
3 **REQUEST FOR ADMISSION NO. 255:**

4 Admit that GOOGLE did not remove the SSO of the 37 JAVA API PACKAGES from  
5 any ANDROID VERSION that came before Gingerbread.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 255:**

7 In addition to its General Objections, Google objects to this Request for Admission as  
8 vague, ambiguous and overly broad as to the phrases “Google,” “remove,” “the SSO of the 37  
9 Java API Packages,” “any Android version that came before Gingerbread.” Google objects to  
10 this Request for Admission as overly broad, unduly burdensome, and not reasonably calculated to  
11 lead to the discovery of admissible evidence to the extent it seeks information not related to any  
12 party’s claims or defenses or any relevant subject matter at issue. Google also objects to this  
13 Request for Admission as unreasonably cumulative or duplicative to the extent that it seeks  
14 information that is more conveniently or less expensively obtained from another source or that is  
15 publicly available. Google objects to this Request for Admission to the extent it purports to  
16 include software created, modified, and/or distributed by third parties and not Google. Google  
17 further objects to this Request for Admission to the extent that it seeks information not within  
18 Google’s possession, custody or control. Google further objects to this Request for Admission as  
19 overbroad and compound, and therefore burdensome and harassing, in that it seeks a single  
20 response to what are in essence numerous and various separate queries.

21 Subject to and without waiving the foregoing objections and the General Objections, and  
22 to the extent that this request is understood, Google denies that any version of Android that came  
23 before Gingerbread contains the entire SSO of the 37 Java API Packages, but admits that Android  
24 versions that came before Gingerbread contained some, but not all, of the method headers that  
25 reflect the structure, sequence, and organization of the 37 Java API Packages, and that Google did  
26 not remove those method headers from Android versions that came before Gingerbread after  
27 those versions were released.

1 that it seeks information not within Google's possession, custody or control. As described further  
2 in General Objection Number 15, Google further objects to this Request for Admission as  
3 premature to the extent it seeks expert testimony.

4 Subject to and without waiving the foregoing objections and the General Objections, and  
5 to the extent that this request is understood, Google denies this request.

6  
7 **REQUEST FOR ADMISSION NO. 264:**

8 Admit Chrome OS replicates the SSO of the 37 JAVA API PACKAGES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 264:**

10 In addition to its General Objections, Google objects to this Request for Admission as  
11 vague, ambiguous and overly broad as to the phrases "Chrome OS," "replicates," "the SSO of the  
12 37 Java API Packages." Google objects to this request because it is vague and unbounded as to  
13 time. Google objects to this Request for Admission as overly broad, unduly burdensome, and not  
14 reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks  
15 information not related to any party's claims or defenses or any relevant subject matter at issue.  
16 Google also objects to this Request for Admission as unreasonably cumulative or duplicative to  
17 the extent that it seeks information that is more conveniently or less expensively obtained from  
18 another source or that is publicly available. Google objects to this Request for Admission to the  
19 extent it purports to include software created, modified, and/or distributed by third parties and not  
20 Google. Google further objects to this Request for Admission to the extent that it seeks  
21 information not within Google's possession, custody or control. As described further in General  
22 Objection Number 15, Google further objects to this Request for Admission as premature to the  
23 extent it seeks expert testimony.

24 Subject to and without waiving the foregoing objections and the General Objections, and  
25 to the extent that this request is understood, Google denies this request.

26  
27 **REQUEST FOR ADMISSION NO. 265:**

28 Admit that ANDROID source code would not compile without DECLARING CODE

Packages in Android before November 5, 2007.

**REQUEST FOR ADMISSION NO. 277:**

Admit that ANDROID source code was not available to the public until after November 5, 2007.

**RESPONSE TO REQUEST FOR ADMISSION NO. 277:**

In addition to its General Objections, Google objects to this Request for Admission as vague and ambiguous as to the phrases “Android,” “source code,” and “available to the public.” Google objects to this request to the extent it assumes facts not in evidence. Google objects to this Request for Admission as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks information not related to any party’s claims or defenses or any relevant subject matter at issue. Google also objects to this Request for Admission as unreasonably cumulative or duplicative to the extent that it seeks information that is more conveniently or less expensively obtained from another source or that is publicly available. Google objects to this Request for Admission to the extent it purports to include software created, modified, and/or distributed by third parties and not Google. Google further objects to this Request for Admission to the extent that it seeks information not within Google’s possession, custody or control.

Subject to and without waiving the foregoing objections and the General Objections, and to the extent that this request is understood, Google denies this request.

Dated: October 15, 2015

KEKER & VAN NEST LLP

By: /s/ Robert A. Van Nest  
ROBERT A. VAN NEST  
CHRISTA M. ANDERSON  
DANIEL PURCELL

Attorneys for Defendant  
GOOGLE INC.

PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Keker & Van Nest LLP, 633 Battery Street, San Francisco, CA 94111-1809.

On October 15, 2015, I served the following document(s):

**DEFENDANT GOOGLE INC.'S FIRST SUPPLEMENTAL RESPONSES AND  
OBJECTIONS TO PLAINTIFF ORACLE AMERICA, INC.'S REQUESTS FOR  
ADMISSION**

**SET TWO (NOS. 245-277)**

☒ by **ELECTRONIC MAIL (PDF)**: Based on an agreement of the parties to accept service by electronic mail, I caused a true and correct copy of the foregoing document(s) to be sent to the person(s) at the electronic notification address(es) listed below. The email was transmitted without error.

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

Karen G. Johnson-Mckewan  
Annette L. Hurst  
Gabriel M. Ramsey  
405 Howard Street  
San Francisco, CA 94105  
Tel: 415.773.5700 / Fax: 415.773.5759

Peter A. Bicks  
Lisa T. Simpson  
51 West 52nd Street  
New York, NY 10019  
Tel: 212.506.5000 / Fax: 212.506.5151

kjohnson-mckewan@orrick.com  
ahurst@orrick.com  
gramsey@orrick.com  
pbicks@orrick.com  
lsimpson@orrick.com

David Boies  
Boies Schiller & Flexner LLP  
333 Main Street  
Armonk, NY 10504  
Tel: 914.749.8201 / Fax: 914.749.8300  
dboies@bsfllp.com

Attorneys for Plaintiff  
ORACLE AMERICA, INC.  
Oracle-Google@BSFLLP.com

Steven C. Holtzman

1 1999 Harrison St., Ste. 900  
Oakland, CA 94612  
2 Tel: 510.874.1000 / Fax: 510.874.1460  
sholtzman@bsfillp.com  
3

ORACLE CORPORATION  
4 Dorian Daley  
Deborah K. Miller  
5 Matthew M. Sarboraria  
Ruchika Agrawal  
6 500 Oracle Parkway,  
Redwood City, CA 94065  
7 Tel: 650.506.5200 / Fax: 650.506.7117

8 dorian.daley@oracle.com  
9 deborah.miller@oracle.com  
matthew.sarboraria@oracle.com  
10 ruchika.agrawal@oracle.com

11 Executed on October 15, 2015, at San Francisco, California.

12 I declare under penalty of perjury under the laws of the State of California that the above is true  
13 and correct.

14  
15 /s/ Edward A. Bayley  
Edward A. Bayley  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28